

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CBV, INC.,

Plaintiff

v.

C.A. No. 1:21-cv-01456-GBW

CHANBOND, LLC,

and

DEIRDRE LEANE and IPNAV, LLC,

Defendants.

**PLAINTIFF'S MOTION FOR LEAVE TO FILE
SECOND AMENDED COMPLAINT**

Plaintiff CBV, Inc. (“CBV” or “Plaintiff”), by and through its undersigned counsel, and pursuant Rule 15 of the Federal Rules of Civil Procedure, hereby moves this Court for leave to amend its Amended Complaint. In support, pursuant to Paragraph 4 of the Court’s Scheduling Order in this action, Plaintiff submits herewith a letter brief in support of this Motion.

BUCHANAN, INGERSOLL & ROONEY PC

Dated: May 24, 2023

/s/ Geoffrey Grivner

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